

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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In the Matter of)
)
Replacement of Part 90 by)
Part 88 to Revise the Private)
Land Mobile Radio Services)
and Modify the Policies)
Governing Them)
)
and)
)
Examination of Exclusivity)
and Frequency Assignment)
Policies of the Private)
Land Mobile Radio Services)

PR Docket No. 92-235

To: The Commission

COMMENTS

ON

CONSOLIDATION OF RADIO SERVICES
OF THE
INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, INC.,
AND THE
INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION

The International Municipal Signal Association ("IMSA")
and the International Association of Fire Chiefs, Inc.
("IAFC") respectfully submit this statement regarding the
consolidation of radio services, consistent with paragraph

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52 of the Report and Order and Further Notice of Proposed Rulemaking in this proceeding.^{1/}

In the Report and Order and Further Notice, the Commission afforded the private land mobile radio community three months from the effective date to negotiate and submit a comprehensive consensus plan for consolidation of radio services. Subsequently, in September 1995, the Commission and the National Telecommunications and Information Administration established the Public Safety Wireless Advisory Committee (PSWAC). PSWAC is charged with advising the Commission and NTIA on operational, technical and spectrum requirements of federal, state and local public safety entities through the year 2010. Whereas consolidation of the Commission's public safety radio service categories available to state and local entities for licensing is not specifically embraced within the PSWAC charge, the Commission's consolidation goal of "more flexible spectrum use"^{2/} certainly is embraced within the elements of long-term spectrum planning, delineation and satisfaction of operational requirements, and inter-operability, which are within the PSWAC charge. Indeed, the

^{1/} 60 Fed. Reg. 37152 (July 19, 1995).

^{2/} Report and Order at ¶ 50.

PSWAC Transition Subcommittee "will examine spectrum management options...[and] will consider alternatives evolving around shared and exclusive assignments as well as individual and blanket licensing alternatives.^{3/} Accordingly, there is a substantial interrelationship between consolidation of public safety radio services and the charter of PSWAC.

Moreover, leaders of the various public safety advisory committees hold leadership positions, or otherwise are involved, in PSWAC. Leaders of three of the four public safety land mobile organizations involved in frequency coordination, including the manager of the IAFC/IMSA coordinating committee for the Fire and Emergency Medical services, either chair or serve as alternate chair of PSWAC subcommittees. Since, and even preceding, the September 11 initial PSWAC meeting, the meeting schedule and work commitments to PSWAC have placed a substantial demand upon the time of those involved in the Advisory Committee.

In consideration of both the interrelationship between the issue of service consolidation and PSWAC, and the time commitments imposed by PSWAC upon leaders of the public

^{3/} Public Safety Wireless Advisory Committee, information package (September 11, 1995).

safety organizations, IAFC/IMSA, the Association of Public Safety Communications Officers, and the Public Safety Communications Council each requested the Commission to stay the consolidation provisions in this proceeding as they apply to the public safety radio services pending the completion of the PSWAC report and a reasonable time for evaluation of its impact on the service consolidation issue.

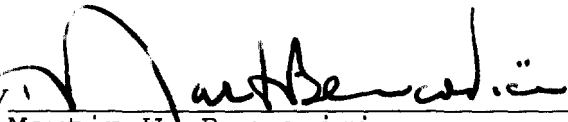
Notwithstanding the passage of more than eight (8) weeks, the Commission has not responded to the three petitions for stay. Believing the petitions were well-founded, and being occupied with PSWAC, serving the industry as frequency coordinators in a timely fashion, and in some instances fulfilling primary job responsibilities, the public safety communications community has not met to address service consolidation.

IAFC/IMSA certainly are prepared to respond to the Commission's invitation to consult with the other impacted coordinators and provide their views on service consolidation. Should the Commission grant the stay requests, comments on service consolidation will be submitted shortly after the submission of the PSWAC final report. Should the Commission not be disposed to granting the stay requests, IAFC/IMSA will, in timely fashion after

that decision is issued, undertake consultation with other public safety radio service representatives and seek to respond collectively to the Commission's invitation to comment. Necessarily at this juncture, such comments to the Commission may be late filed in relation to the initial due date. The Commission states in the Report and Order and Further Notice that a final decision on the service consolidation issue will not be forthcoming for some six months after the effective date.^{4/} Accordingly, any comments or recommendations by the public safety community will be submitted in adequate time for consideration prior to the adoption of final action in this proceeding.

Respectfully submitted,

**INTERNATIONAL MUNICIPAL SIGNAL
ASSOCIATION
AND
INTERNATIONAL ASSOCIATION OF
FIRE CHIEFS, INC.**

By 

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^{4/} Report and Order at ¶ 55.